



December 12, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Subject: 900 MHz Band Pre-Positioning

Dear Ms. Dortch:

Long Island Electric Utility Servco LLC, a wholly-owned subsidiary of PSEG Long Island LLC, is the service provider for the Long Island Power Authority and its subsidiary, Long Island Lighting Company d/b/a LIPA ("LIPA"). Through its service provider, LIPA provides electric power for approximately 2.7 million people in Nassau, Suffolk and Queens counties on Long Island, New York. Among other wireless facilities, LIPA is licensed to operate a 900 MHz system that it is in the process of upgrading to a P-25 simulcast system to take advantage of that technology's enhanced features and interoperability capability.

This letter is being submitted in support of the changes that have been proposed for the 900 MHz band, including a joint request from the Enterprise Wireless Alliance ("EWA") and pdvWireless, Inc. ("PDV") to sub-divide the band into a 2X2 MHz narrowband and 3X3 MHz private carrier broadband allocation (WT Docket No. 17-200.) While LIPA has not yet made any determination as to its future need for such a broadband service, it does want to ensure that its new system would be deployed on frequencies that are expected to remain available for narrowband use.

Moving to replacement frequencies is easiest when installing a new or upgraded system, since it can result in little or no potential disruption of day-to-day activities, and thus puts both LIPA and PDV in the best position for 900 MHz spectrum moving forward should PDV's request be granted.

Therefore, LIPA was pleased to reach agreement with PDV regarding a spectrum exchange that will allow LIPA to deploy its system on frequencies below 937 MHz exclusively, an exchange that mirrors the frequency swap PDV has completed already with PSEG Services Corp., an affiliate of PSEG Long Island and PSE&G, a New Jersey utility. Long Island Electric Utility Servco LLC, as agent of and acting on behalf of LIPA has agreed to this exchange based on a technical assessment that its new system will operate satisfactorily with all frequencies in the proposed 2X2 MHz narrowband segment and will support interoperability for joint restoration of the critical infrastructure electric system for both the Long Island and New Jersey utilities. Based on its experience with PDV to date, Long Island Electric Utility Servco LLC fully expects PDV to fulfill the commitment it has made to 900 MHz incumbents and the FCC regarding non-interference to narrowband operations and to act promptly to address any problems in the unlikely event that interference should arise. With PDV's commitment to protect incumbents, Long Island Electric Utility Servco LLC supports efforts to pre-position licensees into the proposed 2x2 MHz narrowband segment supporting their proposal to develop a private carrier broadband solution in a 3x3 MHz broadband allocation, and is actively relocating our existing 900 MHz spectrum to support PDV's proposed configurations, provided the implementation of any proposal has no unacceptable disruptions to critical infrastructure operations.

Sincerely,

Long Island Electric Utility Service LLC
as agent of and acting on behalf of
Long Island Lighting Company d/b/a LIPA

A handwritten signature in black ink, reading "Jeffrey Greenblatt". The signature is written in a cursive style with a large, looping "J" and a distinct "G".

Jeffrey Greenblatt
Senior Counsel Regulatory